

REMARKS

Claims 1, 12, 17, 19, and 24 have been amended. New claims 26-27 have been added. No new matter has been introduced. Claims 1-27 are pending in this application.

Claims 1-25 stand rejected under 35 U.S.C. § 101 based on the claimed invention being directed to non-statutory subject matter. This rejection is respectfully traversed.

The Office Action expressed concern that claims 1-11 have no language that “ties the limitations of the claims to being executed on a computer.” Office Action at 2. The Board of Patent Appeals and Interferences, however, has held there are no “judicially recognized separate ‘technological arts’ test to determine patent eligible subject matter under § 101.” Ex parte Lundgren, Appeal No. 2003-2088 (2005). In Lundgren, the examiner rejected a method stating that “without the disclosure or suggestion of computer, automated means, apparatus of any kind, the invention as claimed is found non-statutory.” Id. The Board disagreed with the rejection and concluded there is no separate “technological arts” test in determining whether a process is statutory subject matter.

The Office Action also states that claim 12 is drawn to a computer program not stored on an appropriate computer readable medium to enable any underlying functionality to be realized. Claims 12, 17, 19, and 24 have been amended to more clearly recite the claimed method being structurally and functionally interrelated to the medium. Please note that the term “medium” should be broadly construed consistent with the specification. It should not be limited, for example, to the media described in the present application. Withdrawal of the rejection is respectfully requested.

Claims 1-3 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Hirata, U.S. Patent No. 6,240,424 ("Hirata"). This rejection is respectfully traversed.

Applicants respectfully submit that Hirata does not disclose a "representative image classification database in which each group of images is represented by a respective representative image," as recited in amended claim 1. As noted by the Office Action, Hirata classifies images "under one primary object." Hirata, col. 5, lines 36-40. Thus, *many* images can be classified under *one* primary object or "representative image." This varies from the present invention in which "each group of images is represented by a respective representative image." As such, claim 1 as amended should be allowable over Hirata.

Claims 2, 3, and 4 depend from claim 1 and are allowable along with claim 1 for at least the reasons provided above. Withdrawal of this rejection is respectfully requested.

Claims 5-7, 12-14, and 19-21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over NPL article titled "Recursive Space Decompositions in Force-Directed Graph Drawing Algorithms," written by K.J. Pulo ("Pulo") in further view of Vrhel, U.S. Publication No. 2003/0198384 ("Vrhel"). This rejection is respectfully traversed.

Claims 5, 12, and 19 recite, *inter alia*, "arranging each image included in a minimum unit of a sub-feature space to a corresponding one of the minimum units of the sub-display regions." As stated in the Office Action, Pulo does not disclose this limitation as well as other limitations in the claims. Vrhel does not remedy the deficiencies of Pulo. Vrhel performs a "blurring operation" on pixels of an image. Vrhel, ¶ 0018. The blurring operation corrects "discontinuous or disjointed segments."

Vrhel, ¶ 0018. Thus, the blurring is used to sharpen the original RGB image, whereas the present invention *arranges* “each image included in a minimum unit of a sub-feature space to a corresponding one of the minimum units of the sub-display regions.” Vrhel’s blurring operation varies from the arrangement of images in the present invention. Because Pulo and Vrhel do not teach or suggest all of the limitations of claims 5, 12, and 19, claims 5, 12, and 19 are not obvious over the cited references. Claims 6-9, 13-16, and 20-23 should also be allowable for similar, and also for other reasons. Applicants respectfully request that the 35 U.S.C. § 103(a) rejection be withdrawn.

Claims 10-11, 17-18, and 24-25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Pulo in further view of Vrhel and further in view of Savakis et al., U.S. Publication No. 2003/0059121 (“Savakis”). This rejection is respectfully traversed.

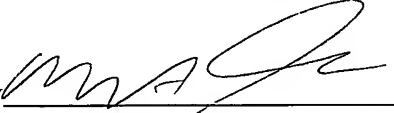
As discussed above, neither Pulo nor Vrhel teach or suggest “arranging each image included in a minimum unit of a sub-feature space to a corresponding one of the minimum units of the sub-display regions.” Savakis does not remedy the deficiencies of Pulo and Vrhel. Instead, Savakis is relied on by the Office Action to teach a feature space and the display space divided into three subsections. Therefore, none of Pulo, Vrhel, and Savakis, even when considered in combination teach or suggest all limitations of claims 10-11, 17-18, and 24-25. Applicants respectfully request that the rejection be withdrawn.

Newly added claims 26-27 depend from claims 1 and 5 and should be allowable along with claims 1 and 5, and for other reasons.

In view of the above amendment, Applicants believes the pending application is in condition for allowance.

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Respectfully submitted,

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